

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

WILLIAM J. LOVELACE and	:	No. 16-CV-04978 (ERK)(CLP)
OCTAVIA LOVELACE	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
SHOWROOM AUTO, LLC	:	
Defendant	:	

**Motion to Vacate Arbitration Award**

Under 9 U.S.C. § 10(a)(4), Plaintiffs, William J. Lovelace and Octavia Lovelace, move this honorable court to vacate the September 26, 2018 arbitration award issued in this matter. Arbitrator John F. Byrne failed to issue a mutual, final and definite award, consequently Plaintiffs move this court to vacate. In support of this motion, Plaintiffs attach a memorandum of law, a declaration in support, and annexed exhibits thereto.

Plaintiffs are filing this motion now, rather than after the motion has been fully briefed, because by statute there is only approximately one month left to file this motion and Plaintiffs do not believe that during this holiday season, it is likely the briefing will not be completed and the papers filed by the statutory deadline, which falls on Christmas.

Dated: November 19, 2018

PLAINTIFFS,

WILLIAM J. LOVELACE  
and OCTAVIA LOVELACE

By: /s/ Daniel S. Blinn  
Daniel S. Blinn  
One of Plaintiffs' Attorneys

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